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July 14, 2003

LaDonna TallBear
Cheyenne-Arapaho Tribe
P. O. Box 38
Concho, Oklahoma 73022

RE: SUPERFUND SITE INSPECTION REPORT ON RAY WICHERT PROPERTY

Dear LaDonna:

Enclosed please find a copy of the Ray Wichert Property (CERCLIS ID No. OKD987095049) Site Inspection (SI) narrative report for your tribe's records. I will submit this SI report to the U. S. EPA Region 6 office in Dallas, Texas within the next few days. I am requesting that the EPA Superfund program give us approval to conduct further investigation at the Ray Wichert Property. The following paragraphs summarize the reasons why I think further investigation is necessary and outline my recommendations for the goals of further investigation.

I do not believe that the SI data are sufficient to document the potential threat that the waste sources on the Ray Wichert Property may pose to nearby targets, including residences, businesses, and a gymnastics school, all of which are located within 200 feet of the site. No soil samples were collected from any of these potential targets, so the impact of site wastes on these targets is unknown. In addition, the soil sample data do not adequately characterize waste sources and potential soil and groundwater contamination on the Ray Wichert Property. For example, soil samples were not analyzed for radium, which is the primary contaminant of concern on the site. Furthermore, soil and groundwater samples were not collected from areas of the site that may have been impacted by petroleum products from the underground storage tanks (USTs) present on the site.

Given these considerations, I believe an expanded site inspection (ESI) of the Ray Wichert Property is warranted. The sampling plan for the ESI should focus on the following goals: (1) collection of surface soil samples among the waste piles on site and determination of the radium concentration in those samples; (2) collection of surface soil samples from the immediate vicinity of the USTs lying on site and determination of the polynuclear aromatic hydrocarbon (PAH) concentrations in those samples; (3) use of soil boring equipment for the collection of deep soil and shallow groundwater samples from the south end of the site (where the USTs had been buried when the site was active) and determination of volatile organic compound (VOC) and PAH concentrations in those samples; (4) collection of surface soil samples from nearby residences, businesses, pastures,



and the gymnastics school to determine if radium or other contaminants (VOCs, PAHs) from the Ray Wichert Property have impacted those nearby targets; and (5) collection of sufficient background surface soil samples to determine if the PAHs and pesticides in soil on the Ray Wichert Property may be derived from sources other than those (waste piles, USTs) on the site. If access to the Ray Wichert Property is denied by the site owner(s), the ESI should, at the very least, collect the samples described in points 4 and 5 of this paragraph.

Please call me if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Kent Curtis".

Kent Curtis, Environmental Specialist II, ITEC

Enclosure

cc: LaDonna Walker, U. S. EPA, Dallas
OES File